



Bristol-Myers Squibb

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Pharmaceutical Working Group
c/o Angelo J. Bellomo, REHS, QEP
Deputy Director for Health Protection
5050 Commerce Drive
Baldwin Park, CA 91706

Dear Director Bellomo,

Bristol-Myers Squibb appreciates the opportunity to provide comments in response to Los Angeles County's proposed Extended Producer Responsibility (EPR) Pharmaceuticals and Sharps Ordinance. Bristol-Myers Squibb is committed to protecting the health and safety of our employees, contractors, customers, the public and the environment by conducting business in an environmentally responsible and sustainable manner. We are working to better understand the qualitative and quantitative impacts of our products and, as a result, have developed formalized product stewardship programs, including a voluntary household-generated sharps takeback program for Orencia®, our only home-applied injectable product.

Bristol-Myers Squibb does not support the implementation of this draft Ordinance. We are disappointed that input from the Pharmaceutical Research and Manufacturers of America (PhRMA) and from the Biotechnology Innovation Organization (BIO) does not appear to have been considered and that this Ordinance will not likely have a meaningful impact on drug abuse or pharmaceuticals in the environment. Bristol-Myers Squibb has a number of concerns with regulatorily mandated drug/sharps takeback Ordinances in general; many of these already have been expressed to Los Angeles County by PhRMA.

We have the following additional concerns specifically about Los Angeles County's draft Ordinance:

1. Sharps – The draft Ordinance does not allow exemptions for companies with voluntary sharps takeback programs. Additionally, there are already many public and private sector solutions available to help patients properly dispose of used sharps. Furthermore, there are existing requirements for the sharps industry in California. This includes providing information about safe disposal in the package inserts that come with our medicines, maintaining a call center to help patients with questions on disposal and posting information on company websites. While programs commonly exist to properly dispose of sharps used with prescription medicines, illicit drug use is also a source of sharps in the waste stream. Unfortunately, a sharps disposal mandate would not address this issue.

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2. Definition of Biologics – The definition of Biologics in the draft Ordinance is not representative of several types of biologics now common in the pharmaceutical industry, but that present limited risk for environmental impact or drug abuse.

For the reasons stated above and in the letter from PhRMA, we do not support adoption of the Los Angeles County Pharmaceuticals and Sharps Collection and Disposal Stewardship Ordinance. Please feel free to contact me with any questions or concerns.

Regards,



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Environmental, Health, Safety and Sustainability
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